

U.S. DISTRICT COURT  
UNITED STATES DISTRICT COURT  
FILED  
EASTERN DISTRICT OF WISCONSIN  
2011 OCT 26 A 490

---

UNITED STATES OF AMERICA,  
v.  
Plaintiff,

JON W. SANFILLIPPO  
CLERK

Case No: 11-CR-11 - CR 238  
[18 U.S.C. §§ 371, 1591, & 2]

SEAN D. PATRICK, a/k/a "SP,"  
Defendant.

---

## INFORMATION

---

### **COUNT ONE** **(Conspiracy To Sex Traffic in Children)**

THE UNITED STATES ATTORNEY CHARGES:

#### **The Conspiracy And Its Objective**

1. Beginning sometime in 2006 and continuing through about April 2010, in the State and Eastern District of Wisconsin and elsewhere,

**SEAN D. PATRICK,**  
**a/k/a "SP,"**

did knowingly and intentionally conspire with others to recruit, entice, harbor, transport, provide, and obtain by any means, minor females, in and affecting interstate and foreign commerce, knowing that the minor females had not attained the age of 18 years and would be caused to engage in commercial sex acts, in violation of Title 18, United States Code, Section 1591(a)(1).

### **Manner And Means Of The Conspiracy**

It was part of the conspiracy that:

3. PATRICK and his most trusted prostituted females recruited minor females and PATRICK introduced them to prostitution as a way for them to make money. Both PATRICK and his most trusted prostitutes instructed the new recruits in PATRICK's "rules" of prostitution.

4. PATRICK required his prostituted females to work between five and seven nights a week soliciting customers for paid sex. They were required to give PATRICK all the money that they earned from prostitution.

5. During the day, up to five prostituted females slept in a single hotel room paid for by PATRICK. In the early evening, around 5:00 p.m to 6:00 p.m., PATRICK directed one of his prostitutes to go to the Greyhound Station in Milwaukee, Wisconsin, to purchase bus tickets for the women who would be traveling to Chicago, Illinois, later that evening to prostitute for PATRICK.

6. In the evening, PATRICK, or another at his behest, drove the prostituted females to the Greyhound Station (Intermodal Station) in Milwaukee, Wisconsin, so that they could ride the Greyhound Bus to Chicago, Illinois, to prostitute there. The bus left Milwaukee at approximately 9:05 p.m. The prostituted females generally rode the 6:00 a.m train from Chicago back to Milwaukee. PATRICK, or another at his behest, met the prostituted females at the station, collected their prostitution earnings, and then drove them to a Milwaukee-area hotel where they stayed under PATRICK's direction.

7. While prostituting in Chicago, or other cities, PATRICK's most trusted prostitutes were required to supervise or otherwise oversee the newer prostituted females.

8. In order to transport more prostituted females from one location to another at one time, PATRICK purchased a conversion van on which he had inscribed the words "Ho Hauler."

9. PATRICK punished his prostituted females for failing to follow his rules, being disrespectful to him, missing the bus to Chicago, or not earning enough money, in the following ways, among others: choking, slapping, punching, or stomping them; hitting them with objects such as cords, belts, hi-heeled shoes, and bottles; requiring them to stand naked in the street next to the "Ho Hauler" such that they were observed by his friends or others; and requiring them to have sex with his friends or with each other while PATRICK's friends watched.

#### **Acts In Furtherance Of The Conspiracy**

In furtherance of the conspiracy PATRICK, and others at his direction, committed and caused to be committed the following acts, among others:

11. On or about January 28, 2006, the transportation of Child #1 from Milwaukee, Wisconsin, to Chicago, Illinois, for the purpose of engaging in prostitution.

12. On or about February 6, 2006, the transportation of Child #1 from Milwaukee, Wisconsin, to Chicago, Illinois, for the purpose of engaging in prostitution.

13. On or about July 26, 2006, the transportation of Child #1 from Milwaukee, Wisconsin, to Chicago, Illinois, for the purpose of engaging in prostitution.

14. On or about October 28, 2006, the transportation of Child #1 from Milwaukee, Wisconsin, to Chicago, Illinois, for the purpose of engaging in prostitution.

15. On or about November 9, 2006, the transportation of Child #1 from Milwaukee, Wisconsin, to Chicago, Illinois, for the purpose of engaging in prostitution.

16. On or about July 24, 2007, the transportation of Child #2 from Milwaukee, Wisconsin, to Chicago, Illinois, for the purpose of engaging in prostitution.

17. On or about October 8, 2007, the transportation of Child #2 from Milwaukee, Wisconsin, to Chicago, Illinois, for the purpose of engaging in prostitution.

18. On or about October 31, 2007, the transportation of Child #2 from Milwaukee, Wisconsin, to Chicago, Illinois, for the purpose of engaging in prostitution.

19. On or about February 28, 2008, the transportation of Child #3 from Milwaukee, Wisconsin, to Chicago, Illinois, for the purpose of engaging in prostitution.

20. On or about May 24, 2009, the transportation of Child #3 from Milwaukee, Wisconsin, to Chicago, Illinois, for the purpose of engaging in prostitution.

21. On November 9, 2009, at the Greyhound Station in Milwaukee, Wisconsin, PATRICK threatened the life of a Greyhound Ticket Agent who had informed him that his prostitutes could not ride the bus to Chicago that evening because they had arrived late and the bus was full.

22. On or about April 7, 2010, the transportation of Child #3 from Milwaukee, Wisconsin, to Chicago, Illinois, for the purpose of engaging in prostitution.

All in violation of Title 18 United States Code, Section 371.

**COUNT TWO**  
**(Sex Trafficking of a Child By Use of Force, Fraud, or Coercion)**

THE UNITED STATES ATTORNEY FURTHER CHARGES:

From in or about July 2005, through in or about April 2010, in the State and Eastern District of Wisconsin and elsewhere,

**SEAN D. PATRICK,**  
**a/k/a "SP,"**

in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, and obtain by any means prostituted Child #1, knowing that prostituted Child #1 had not attained the age of 18 years and would be caused to engage in a commercial sex act, and knowing that force, fraud, and coercion would be used to cause prostituted Child #1 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and 2.

**COUNT THREE**  
**(Sex Trafficking of a Child By Use of Force, Fraud, or Coercion)**

THE UNITED STATES ATTORNEY FURTHER CHARGES:

From in or about July 2006, through on or about February 15, 2010, in the State and Eastern District of Wisconsin and elsewhere,

**SEAN D. PATRICK,**  
**a/k/a "SP,"**

in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, and obtain by any means prostituted Child #2, knowing that prostituted Child #2 had not attained the age of 18 years and would be caused to engage in a commercial sex act, and knowing that force, fraud, and coercion would be used to cause prostituted Child #2 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and 2.

**COUNT FOUR**  
**(Sex Trafficking of a Child)**

THE UNITED STATES ATTORNEY FURTHER CHARGES:

From in or about March 2007, through on or about April 7, 2010, in  
the State and Eastern District of Wisconsin and elsewhere,

**SEAN D. PATRICK,**  
**a/k/a "SP,"**

in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, and obtain by any means prostituted Child #3, and did benefit, financially and by receiving a thing of value, knowing that prostituted Child #3 had not attained the age of 18 years and would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) & 2.

**FORFEITURE NOTICE**

1. The allegations contained in Counts One through Four of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the statutes set forth below.

2. Upon conviction of the offense of conspiracy to violate section 1591, in violation of Title 18, United States Code, Section 371, set forth in Count One of the Information, the defendant, SEAN D. PATRICK shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to, the following:

- \$10,960 in United States currency;
- a gold 1992 Chevrolet conversion van with the words "Ho Hauler" inscribed on the front quarter panel.

3. Upon conviction of the offense of sex trafficking of a minor or by use of force, fraud, or coercion, or both, in violation of Title 18, United States Code, Section 1591, as set forth in Counts Two through Four of the Information, the defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 1594: (a) any property, real or personal, used or intended to be used to commit or to facilitate the commission of the offense; and (b) any property, real or personal, constituting or derived from, any proceeds obtained,

directly or indirectly, as a result of the offense. The property to be forfeited includes, but is not limited to, the property identified in paragraph 2 above.

4. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

Dated: October 25, 2011



JAMES L. SANTELLE  
United States Attorney